## COMMONWEALTH OF VIRGINIA Department of Environmental Quality South Central Regional Office

#### STATEMENT OF LEGAL AND FACTUAL BASIS

Corning Inc.
265 Corning Avenue, Danville, Virginia
Permit No. SCRO30422

Title V of the 1990 Clean Air Act Amendments required each state to develop a permit program to ensure that certain facilities have federal Air Pollution Operating Permits, called Title V Operating Permits. As required by 40 CFR Part 70 and 9 VAC 5 Chapter 80, Corning has applied for a Title V Operating Permit for its Danville facility. The Department has reviewed the application and has prepared a draft renewal Title V Operating Permit.

Engineer/Permit Contact:	Date: <u>August 20, 2007</u>
Air Permit Manager:	Date: <u>August 20, 2007</u>
Regional Director:	Date: <u>August 20, 2007</u>

#### **FACILITY INFORMATION**

Permittee
Corning Inc.
HP-ME-03-055
Corning, NY 14831

Facility
Corning Incorporated
265 Corning Drive
Danville, VA 24541

County-Plant Identification Number: 51-590-00038

#### SOURCE DESCRIPTION

NAICS Code - 327212 Corning Incorporated is a manufacturer of specialty glass. In the glass forming process, raw materials are loaded into one of 7 melting furnaces (also referred to as melting tanks). Molten glass is formed and then may be treated in either a ceramming oven or by a chemical process (vycor leaching) which produces glass that can be rapidly heated and cooled.

Corning is a Title V major source of  $NO_x$  and arsenic. Potential emissions of HF are less than major source thresholds.<sup>1</sup> The source is located in an attainment area for all pollutants. The facility's operation is limited by minor NSR permits dated: February 5, 1980, June 6 1994, June 24, 2001 and November 27, 2001.

#### **COMPLIANCE STATUS**

A full compliance evaluation of this facility, including a site visit, has been conducted. In addition, all reports and other data required by permit conditions or regulations, which are submitted to DEQ, are evaluated for compliance. Based on these compliance evaluations, the facility has not been found to be in violation of any state or federal applicable requirements at this time.

#### CHANGES TO THE TITLE V PERMIT

The following changes are made to the Title V renewal since issuance in August 26, 2002,

- Update responsible official (Section I)
- Update to general conditions to reflect current boilerplate language (Section XIV)

<sup>&</sup>lt;sup>1</sup> Vycor Leach Room HF Emission Factor Derivation, Corning letter to DEQ dated January 30, 2003.

#### EMISSION UNIT AND CONTROL DEVICE IDENTIFICATION

The emissions units at this facility are listed in the following table:

Emission Unit ID	Stack ID	<b>Emission Unit Description</b>	Size/Rated Capacity*	Pollution Control Device (PCD) Description	PCD ID	Pollutant Controlled	Applicable Permit Date
400-03 400-04	P01	Boilers No. 1,2 Orr & Sembower; Model 3LG (gas/oil/propane); 1961	10.5 MMBtu/hr, each	-	1	-	-
400-05	P02	Boiler No. 3 Cleaver Brooks; Model CB-200-250 (gas/propane); 1980	10.5 MMBtu/hr	-	1	-	July 24, 2001
EU-02	P18	Raw Material Weighing Stations, Mixers, & Dump Stations; 1989	2.5 tons/hr	Pneumafil Model 11.5 Fabric Filter	-	PM	-
T172	F11	Corning, Inc. Glass Melting Furnace; Hot and Cold Crown; 1970	445 lb/hr	-	-	-	-
T173	F11	Corning, Inc. Glass Melting Furnace; Hot Crown; 1970	416 lb/hr	-	-	-	-
T174	F11	Corning, Inc. Glass Melting Furnace; Hot Crown; 1965	280 lb/hr	-	-	-	-
T175	F11	Corning, Inc. Glass Melting Furnace; Hot Crown; 1965	280 lb/hr				
T176	F11	Corning, Inc. Glass Melting Furnace; Hot Crown; 1964	250 lb/hr	-	-	-	-
T177	F11	Corning, Inc. Glass Melting Furnace; Hot and Cold Crown; 1970	335 lb/hr	-	-	-	-

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity*	Pollution Control Device (PCD) Description	PCD ID	Pollutant Controlled	Applicable Permit Date
	F11,	Corning, Inc. Glass Melting					
T179	420-13,	Furnace;	416 lb/hr	-	-	-	November 27, 2001
	420-14	Cold Crown; 1970					
343-69	343-69	Eutectic Ultra-Jet Metal	9 lb/hr	Torit Model DFTZ-4	-	PM	June 6, 1994
343-09	343-09	Powder Coating; 1994	9 10/111	Cartridge Filter		PIVI	Julie 0, 1994
353-20	P21	HF Bath; 1981	270 gal	-	-	-	-
EU-20	D46	Vycor Leach Lines; 1980	9 lines; 12,600		-	-	-
EU-20 P46	F40		gal/line	-			

#### **EMISSIONS INVENTORY**

A copy of the 2006 annual emission update is attached. Emissions are summarized in the following tables.

Criteria Pollutant Emissions (ton/yr)						
Emission Unit	VOC	CO	SO <sub>2</sub>	PM/PM10	PM2.5	NO <sub>x</sub>
Total	0.52	4.00	4.06	2.98/3.00	2.72	11.82

Hazardous Air Pollutant Emissions			
Pollutant Emissions (ton/yr)			
Arsenic	0.180		
Hydrofluoric acid	1.099		
Total	1.235		

#### **EMISSION UNIT APPLICABLE REQUIREMENTS**

#### I. Fuel Burning Equipment – Orr & Semblower Boilers (400-03 and 400-04)

#### A. Limitations

Fuel usage for the boilers is limited to natural gas, propane, and distillate oil. Boiler emissions are controlled by proper operation and maintenance, and operator training. A maintenance schedule shall be maintained in order to minimize the duration and frequency of excess emissions.

The following Virginia Administrative Codes that have specific emission requirements have been determined to be applicable:

- 9 VAC 5-40-900 Existing Source Standard for Particulate Matter
- 9 VAC 5-40-930 Existing Source Standard for Sulfur Dioxide
- 9 VAC 5-40-940 Existing Source Standard for Visible Emissions

The standards for particulate matter, sulfur dioxide, and visible emissions (VE) are as follows:

- Allowable particulate emissions rate (E) is calculated by the following:
- $E = 1.0906 * H^{-0.2594}$ , where H = total MMBtu for installation
- $E = 1.0906 * (2 * 10.5)^{-0.2594} = 0.4951 \text{ lb/MMBtu}$
- Allowable SO<sub>2</sub> emissions (S) rate, expressed in lb/hr, is calculated as follows:
- S = 2.64 \* K, where K = total MMBtu capacity for installation
- S = 2.64 \* (10.5) = 27.72 lb/hr

#### Visible Emissions

Visible emissions from the exhausts of each boiler is are limited to 20 percent opacity except during one six-minute period in which the opacity shall not exceed 60 percent, as determined by EPA Method 9 (per 9 VAC 5-40-20A.2). 9 VAC 5-40-20.A.4 stipulates that this condition applies at all times except startup, shutdown, or malfunction, however, this exclusion is not approved in Virginia's State Implementation Plan and is not included in the Title V permit.

#### B. Periodic Monitoring

Periodic monitoring requirements for opacity from the boilers are based on observation of the presence or absence of visible emissions. Since the only approved fuels are gas and distillate oil, no visible emissions are expected. However, in the event visible emissions are observed, corrective action is required. If corrective actions do not result in the absence of visible emissions, Method 9 Visible Emissions Evaluations (VEE) are required to demonstrate compliance with the applicable opacity limit.

#### C. Recordkeeping

The following Virginia Administrative Codes that have specific emission requirements have been determined to be applicable:

9 VAC 5-40-50, "Existing Stationary Sources – Notification, Records and Reporting"

The permit includes requirements for maintaining records of emission data and operating parameters necessary to demonstrate compliance with the permit.

#### II. Fuel Burning Equipment – Cleaver Brooks Boiler (400-05)

#### A. Limitations

The following limitations are derived from the NSR permit issued July 24, 2001:

NSR Condition 3: approved fuels for the boiler are natural gas and propane.

*NSR Condition 4*: boiler emissions shall be controlled by proper operation and maintenance; boiler operators shall be trained in the proper operation of the equipment; develop a maintenance schedule.

*NSR Condition 5*: emissions from the operation of the boiler shall not exceed the limits specified.

NSR Condition 6: visible emissions from the boiler shall not exceed 20 percent opacity.

#### B. Monitoring

Periodic monitoring requirements for opacity from the boiler are based on observation of the presence or absence of visible emissions. Since the only approved fuels are natural gas and propane, no visible emissions are expected. However, in the event visible emissions are observed, corrective action is required. If corrective actions do not result in the absence of visible emissions, VEE's are required to demonstrate compliance with the applicable opacity limit.

#### C. Recordkeeping

The following Virginia Administrative Codes that have specific emission requirements have been determined to be applicable:

9 VAC 5-50-50, "New and Modified Stationary Sources – Notification, Records and Reporting"

The permit includes requirements for maintaining records of emission data and operating parameters necessary to demonstrate compliance with the permit.

#### III. Process Equipment – Metal Powder Spray Coating (343-69)

#### A. Limitations

The following limitations are derived from the NSR permit issued June 6, 1994:

*NSR Condition 3*: particulate emissions controlled by cartridge filter; have adequate access for inspection; monitoring device equipped to measure differential pressure; monitoring device be in an accessible location.

NSR Condition 5: process shall not operate more than 180 hours per year.

NSR Condition 6: visible emissions shall not exceed the limits specified.

In order to minimize the duration and frequency of excess emissions, the permittee shall develop a maintenance schedule, have written procedure and maintain an inventory of spare parts.

#### B. Monitoring

Monthly visual evaluation of the metal powder coating system stack for compliance with the opacity limitation is required. A corrective action plan requires more frequent observations until no visible emissions are observed. Compliance is demonstrated by a stack observations log.

#### C. Recordkeeping

The following limitations are derived from the NSR permit issued June 6, 1994:

*NSR Condition 8*: permittee shall maintain records of all emission data necessary to show compliance

NSR Condition 12: permittee shall develop a maintenance schedule... and inventory of spare parts

NSR Condition 13: permittee shall have written operating procedures and maintain records of operating training

#### IV. Process Equipment – Glass Melting Furnaces (T172-T177, T179)

#### A. Limitations

The following limitations are derived from the NSR permit issued November 27, 2001:

NSR Condition 3: raw material used in T179 not to contain any inorganic arsenic.

NSR Condition 4: production of non-arsenic glass in T179 is not to exceed the limit specified.

NSR Condition 5: approved fuels are natural gas and propane.

*NSR Condition 6*: glass melting furnace emission shall be controlled by proper operation and maintenance; operators shall be trained in proper equipment operation; good operating procedures.

*NSR Condition* 7: emissions from the operation of glass melting furnace T179 shall not exceed the limits specified.

*NSR Condition* 8: visible emissions from glass melting furnace roof ventilator and furnace stacks, shall not exceed the opacity limit specified.

The following Code of Federal Regulations has been determined to be applicable:

40 CFR part 61 subpart N – Inorganic Arsenic Emissions from Glass Manufacturing Plants

Arsenic emissions from each glass melting furnace shall not exceed the limits specified.

The following Virginia Administrative Codes that have specific emission requirements have been determined to be applicable:

9 VAC 5-40-260, "Existing Stationary Source - Standard for Particulate Matter"

Hourly PM emissions from each glass melting furnace shall be less than the limits specified.

#### B. Periodic Monitoring

Periodic monitoring requirements for opacity from the melt furnaces are based on observation of the presence or absence of visible emissions. Supporting rationale is as follows:

- (a) Estimated emissions (based on a combination of AP-42 emission factors and source-specific emission testing), indicate that expected emissions are less than allowable particulate emission rates based on 9 VAC 5-40-260 (emission limits based on process weight rate).
- (b) A history of no visible emissions from any particulate emission source at the facility supports the belief that these emission sources are in compliance with applicable particulate limits.
- (c) Estimated particulate emissions rates are generally very low (< 1.4 lb/hr for each tank, operating at maximum capacity). The emission units are significant due to HAP emissions, which are quantified using mass balance.

The following Virginia Administrative Codes that have specific emission requirements have been determined to be applicable:

9 VAC 5-40-30, "Existing Stationary Sources – Emission Testing" 9 VAC 5-50-30, "New and Modified Stationary Sources – Performance Testing"

At a frequency not to exceed once every five years, the permittee shall conduct a stack test for PM and PM-10 from at least one (1) glass melting furnace operated as cold crown and at least one (1) glass melting furnace operated as hot crown to demonstrate compliance with the applicable hourly emission limits contained in this permit.

#### C. Recordkeeping

The following Virginia Administrative Codes that have specific emission requirements have been determined to be applicable:

9 VAC 5-40-30, "Existing Stationary Sources – Emission Testing"

9 VAC 5-50-50, "New & Modified Stationary Sources – Notification, Records and Reporting"

The following Code of Federal Regulations has been determined to be applicable:

40 CFR part 61 subpart N – Inorganic Arsenic Emissions from Glass Manufacturing Plants

NSR Condition 9: permittee shall maintain records of all emission data and operating parameters necessary to demonstrate compliance with this permit.

#### V. Process Equipment – HF Bath (353-20)

#### A. Recordkeeping

This unit emits a HAP which is neither particulate nor VOC. Accordingly, records must be kept to quantify emissions for inventory and fee purposes. Currently, there are no federally enforceable standards which are applicable to these units. Therefore recordkeeping only is required.

#### VI. Process Equipment – Vycor Leach Lines (EU-20)

#### A. Recordkeeping

The following Virginia Administrative Code has been determined to be applicable:

9 VAC 5-50-50, "New & Modified Stationary Sources – Notification, Records and Reporting"

Records must be kept to quantify nitric acid and hydrogen fluoride emissions for inventory and fee purposes. Currently, there are no federally enforceable standards which are applicable to these units. Therefore recordkeeping only is required.

#### VII. Process Equipment – Weight Stations, Mixers, and Dump Stations (EU-02)

#### A. Limitations

The following Virginia Administrative Code that has specific emission requirements has been determined to be applicable:

9 VAC 5-40-260, "Existing Stationary Source - Standard for Particulate Matter"

9 VAC 5-50-80, "New & Modified Stationary Sources – Standard for Visible Emissions"

Emissions from operation of the weigh stations, mixers, and dump stations are controlled by a fabric filter. Hourly emissions from the operation of the weigh stations mixers, and dump stations shall not exceed the limit specified. Visible emissions from the fabric filter are limited to 20%.

The permittee shall take measure to minimize the duration and frequency of excess emissions.

#### B. Monitoring

Monthly visual evaluation of the fabric filter stack controlling weigh stations, mixers, and dump stations for compliance with the opacity limitation. A corrective action plan requires more frequent observations until visible emissions within the limits are observed. Compliance is demonstrated by maintaining a metal powder spray coating stack observations log.

#### C. Recordkeeping

The following Virginia Administrative Code that has specific emission requirements has been determined to be applicable:

9 VAC 5-50-50, "New & Modified Stationary Sources – Notification, Records and Reporting"

The permittee shall maintain records of all emission data and operating parameters necessary to demonstrate compliance with this permit.

#### VIII. NESHAP Subpart N

The following Code of Federal Regulations has been determined to be applicable:

40 CFR part 61 subpart N – Inorganic Arsenic Emissions from Glass Manufacturing Plants

The standard of 2.5 Mg arsenic/yr applies to each glass melting furnace that uses commercial arsenic as a raw material. All of Corning's furnaces T172, T174 – T177, are affected by this Subpart. Annual arsenic emissions are calculated monthly as the sum of each consecutive 12-month period.

#### IX. Facility Wide Conditions

Visible emissions from existing emission unit equipment are limited to 20% except for one sixminute period in any one hour where emissions can not exceed 60%. Visible emissions for new emission units can not exceed 20%, except for one six-minute period in any one hour where emissions can not exceed 30%. No new equipment has been installed at the time of this renewal application.

#### X. Compliance Assurance Monitoring (CAM) Assessment

According to 40 CFR 64, compliance assurance monitoring (CAM) applies to pollutant-specific emissions unit (PSEU) at a major source that is required to obtain a part 70 or 71 permit if the unit satisfies <u>all</u> of the following criteria:

- (1) The emission unit is subject to an emission limitation or standard for the applicable regulated air pollutant (or a surrogate thereof), other than an emission limitation or standard that is exempt;
- (2) The unit uses a control device to achieve compliance with any such emission limitation or standard; and
- (3) The unit has pre-control device emissions equal to or greater than 100 percent of the major source threshold.

Corning Inc., employs the following emission unit/operation with control technology: raw material weighing stations, mixers, and dump stations (EU-02) and metal powder coating (343-69). All other fuel burning and process equipment have no add-on control equipment.

A review of the raw material operations (EU-02) and metal powder spray coating system (343-69) deemed each process as not subject to CAM requirements, because:

- 1) The pre-control PM emissions from EU-02 are determined to be 32.85 ton/yr which is less than the 100-ton/yr criteria pollutant threshold. The pre-controlled emissions of antimony, arsenic and fluoride are 0.09, 0.16, and 2.14 ton/yr, respectively; all of which are less than the single HAP threshold of 10 ton/yr and collectively less than 25 ton/yr for any HAP combination threshold.
- 2) The pre-controlled PM emissions from 343-69 are determined to be 2.19 ton/yr, which is less than the 100 ton/yr major source threshold for PM.

#### **Streamlined Requirements**

None

#### **GENERAL CONDITIONS**

The permit contains general conditions required by 40 CFR Part 70 and 9 VAC 5-80-110 that apply to all Federal-operating permitted sources. These include requirements for submitting semi-annual monitoring reports and an annual compliance certification report. The permit also requires notification of deviations from permit requirements or any excess emissions.

#### **Comments on General Conditions**

#### **Section B: Permit Expiration**

This condition refers to the Board taking action on a permit application. The Board is the State Air Pollution Control Board. The authority to take action on permit application(s) has been delegated to the Regions as allowed by §2.1-20.01:2 and §10.1-1185 of the *Code of Virginia*, and the "Department of Environmental Quality Agency Policy Statement No. 3-2006".

#### Section F: Failure/Malfunction Reporting

Section 9 VAC 5-20-180 requires malfunction and excess emission reporting within four hours of discovery. Section 9 VAC 5-80-250 of the Title V regulations also requires malfunction reporting; however, reporting is required within two days. Section 9 VAC 5-20-180 is from the general regulations. All affected facilities are subject to section 9 VAC 5-20-180 including Title V facilities. Section 9 VAC 5-80-250 is from the Title V regulations. Title V facilities are subject to both sections. A facility may make a single report that meets the requirements of 9 VAC 5-20-180 and 9 VAC 5-80-250. The report must be made within four daytime business hours of discovery of the malfunction.

#### Section U: Malfunction as an Affirmative Defense

The regulations contain two reporting requirements for malfunctions that coincide. The reporting requirements are listed in sections 9 VAC 5-80-250 and 9 VAC 5-20-180. The malfunction requirements are listed in General Condition U and General Condition F. For further explanation see the comments on general condition F.

#### **Section Y: Asbestos Requirements**

The Virginia Department of Labor and Industry under Section 40.1-51.20 of the Code of Virginia

also holds authority to enforce 40 CFR 61 Subpart M, National Emission Standards for Asbestos.

#### FUTURE APPLICABLE REQUIREMENTS

## National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial and Institutional Boilers and Process Heaters (40 CFR 63 Subpart DDDDD)

Corning is currently identified as having a potential to emit that is major for HAP. Therefore, the Orr & Sembower (1&2) and Cleaver Brooks boilers are an "affected source" for Subpart DDDDD (unless the facility is documented to be an "area" source of HAP prior to the final compliance date). The compliance deadline is September 13, 2007. The initial notification date was March 12, 2005. The rule currently has "no [emission] limit" for existing liquid and gas-fired boilers and process heaters. An initial notification is all that is required to comply at this time (40 CFR 63.9).

On March 26, 2007, the U.S. Environmental Protection Agency petitioned the U.S. Court of Appeals, D.C. Circuit, for a "voluntary vacatur and remand of the technology-based emissions limitations and compliance deadlines" of Subpart DDDDD. Note that the applicability and compliance deadline statements above are based on the current regulation and may change due to the Court's response and/or subsequent regulatory amendments.

#### **INAPPLICABLE REQUIREMENTS**

### Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units (40 CFR 60 Subpart Dc)

Corning's 10.5 MMBtu/hr Cleaver Brooks boiler does not meet the applicability requirements of Subpart Dc since its construction date was May 6, 1980. The affected date for Dc applicability is that which construction, reconstruction, or modification commenced after June 9, 1989.

# Standards of Performance for Glass Manufacturing Plants (40 CFR 60 Subpart CC) Subpart CC applies to each glass melting furnace that commences construction or modification after June 15, 1979. None of Corning's tanks have been modified since the applicability date. Likewise, each tank produces less than 4.55Mg (5 ton) of glass per day. Therefore, subpart CC does not apply to Corning's glass melting tanks (T172-T177, T179).

#### **INSIGNIFICANT EMISSION UNITS**

The insignificant emission units are presumed to be in compliance with all requirements of the Clean Air Act as may apply. Based on this presumption, no monitoring, recordkeeping or reporting shall be required for these emission units in accordance with 9 VAC 5-80-110. The insignificant emission units include the following:

Emission Unit No.	Emission Unit	Citation <sup>1</sup>	Pollutant Emitted (9 VAC-5-80-720 B)	Rated Capacity (9 VAC-5-80-720 C)
EU-05	Description  Maintenance Painting	9 VAC 5-80-720 A.10	(9 VAC-3-80-720 B)	(9 VAC-3-80-720 C)
280-03	Wantenance I anting	9 VAC 3-60-720 A.10		
280-05 280-09 280-12	Annealing Lehrs (Fuel Burning)	9 VAC 5-80-720 C.2 a		Each with rated capacity < 8.5 MMBtu/hr
EU-07 EU-08 297-23 297-24 297-27	Fire Polishers	9 VAC 5-80-720 C.2 a		Each with rated capacity < 1.8 MMBtu/hr
T172MP T173MP T174MP T175MP T177MP	Mold Preheaters	9 VAC 5-80-720 C.2 a		Each with rated capacity < 1.2 MMBtu/hr
T176TB	Torching Burner	9 VAC 5-80-720 C.2 a		0.05 MMBtu/hr
328-18	Ceramming Oven	9 VAC 5-80-720 C.2 a		4 MMBtu/hr
296-76 296-77 296-78 296-79	Rotary Furnace	9 VAC 5-80-720 C.2 a		Each with rated capacity ≤ 2.0 MMBtu/hr
EU-19	Three End Polishers	9 VAC 5-80-720 C.2 a		2.5 MMBtu/hr total combined capacity
420-55 420-57	Renite Collection System	9 VAC 5-80-720 B.1	PM	
EU-09	Rubber Rod Usage	9 VAC 5-80-720 B.1	PM	
EU-10	Stop Check Compound Usage	9 VAC 5-80-720 B.1	PM	
EU-12	Machine Shop	9 VAC 5-80-720 B.1	PM	
420-75	Brick Drilling	9 VAC 5-80-720 B.1	PM	
210-36 210-72	Cullet Crusher	9 VAC 5-80-720 B.1	PM	
EU-01	6 Sand Silos and Bucket Conveyor	9 VAC 5-80-720 B.1	PM	
EU-04	Arsenic Tank	9 VAC 5-80-720 B.5	Arsenic	
342-08	Sand Blaster	9 VAC 5-80-720 B.1	PM	

Emission	Emission Unit	Citation <sup>1</sup>	Pollutant Emitted	Rated Capacity
Unit No.	Description		(9 VAC-5-80-720 B)	(9 VAC-5-80-720 C)
342-25				
342-27				
346-27				
400-40	Diesel Engine for	9 VAC 5-80-720 C.4 b		215 hp
100 10	Compressor	7 VIC 5 00 720 C.1 0		213 lip
	Diesel Engine for			
403-00	Emergency	9 VAC 5-80-720 C.4 b		115 hp
	Water Pump			
420-36	Machine Shop	9 VAC 5-80-720 A.11		
420-30	(Maintenance)	9 VAC 3-80-720 A.11		
EU-14	Gas Engine for			
_	Emergency	9 VAC 5-80-720 C.4 a		Each $\leq 8 \text{ hp}$
EU-15	Water Pump			_ ^
EU-16	Gas Generator	9 VAC 5-80-720 C.4 a		5 hp
EU-17	Welding Stations	9 VAC 5-80-720 A.22		
EU-18	Wood Cutting &	9 VAC 5-80-720 A.51		
EU-18	Sanding	9 VAC 3-80-720 A.31		
EU-03	Raw Material Feed	0 VAC 5 00 720 D 1	DM	
EU-03	System	9 VAC 5-80-720 B.1	PM	
353-20	HF Frosting Bath	9 VAC 5-80-720 B.5	Hydrogen fluoride	
420-08	Hi-Vac Central Vacuum	9 VAC 5-80-720 B.1	PM	
	CEA-Carter Day			
120.62	Model CFR372-RJ-60	0 VA C 5 00 730 D 1	DM.	
420-62	Baler for Empty Raw	9 VAC 5-80-720 B.1	PM	
	Material Bags			
291-04				
291-05	Nitric Acid Storage	9 VAC 5-80-720 B.1	$NO_x$	
	Tank		- A	

<sup>&</sup>lt;sup>1</sup>The citation criteria for insignificant activities are as follows:

- 9 VAC 5-80-720 A Listed Insignificant Activity, Not Included in Permit Application
- 9 VAC 5-80-720 B Insignificant due to emission levels
- 9 VAC 5-80-720 C Insignificant due to size or production rate

#### **CONFIDENTIAL INFORMATION**

The permittee did not submit a request for confidentiality. All portions of the Title V renewal application are suitable for public review.

#### **PUBLIC PARTICIPATION**

The proposed permit is scheduled for publishing in the *Danville Register* on <u>June 4, 2007</u>. The

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public comment period ends July 4, 2007.